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*Attorney for Proposed Amicus Curiae,
Digital Progress Institute*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

<p>SAMANTHA ALARIO, et al.,</p> <p>Plaintiff,</p> <p>TIKTOK INC.,</p> <p>Consolidated Plaintiff;</p> <p>vs.</p> <p>AUSTIN KNUDSEN, in his official capacity as Attorney General of the State of Montana,</p> <p>Defendant.</p>	<p>Lead Case No. CV 23-56-M-DWM</p> <p>Member Case No. CV 23-61-M-DWM</p> <p>DECLARATION OF JOEL THAYER IN SUPPORT OF MOTION FOR <i>PRO HAC VICE</i> ADMISSION</p>
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I, Joel Thayer, state as follows:

1. I, by and through Montana counsel and pursuant to Rule 83.1(d) of the
Local Rules of Procedure of the United States District Court for the District of

Montana, respectfully apply to the Court to appear in this case *pro hac vice* on behalf of Proposed *Amicus Curiae* Digital Progress Institute.

2. I do not reside in Montana, nor am I regularly employed in Montana. I reside in the District of Columbia and have my office at Thayer, PLLC, 1255 Union Street, 7th Floor, Washington, D.C. 20002; Phone (760) 668-0934; Email JThayer@thayer.tech.

3. The *pro hoc vice* admission fees will be paid simultaneously with filing this application.

4. I am proficient in electronic filing in another federal district court.

5. I have been admitted to practice before the following courts:

Court	Date Admitted
D.C. Court of Appeals	July 7, 2017
The Supreme Court of California	December 30, 2021
U.S. Court of Appeals for D.C. Circuit	June 29, 2018
U.S. Federal Circuit	June 25, 2018
U.S. Court of Appeals for the Second Circuit	February 14, 2022

My admission to these courts has not been terminated.

6. I am in good standing and eligible to practice in each of the courts listed above and am not currently suspended or disbarred in any other court.

7. I have never been held in contempt, otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under Federal Rules of Civil Procedure 11 or 37(b), (c), (d) or (f) or their state equivalent.

8. I am not currently making, nor have I made within the two years preceding this application, any *pro hac vice* applications to the Court.

9. I understand that *pro hac vice* admission in this Court is personal to me only and not an admission of a law firm and that I will be held fully accountable for the conduct of litigation in this Court.

10. In accordance with Montana Rule of Professional Conduct 8.5, I swear and affirm that I will be bound by the Montana Rules of Professional Conduct (except Rules 6.1 through 6.4) in my practice of law in this State. Furthermore, I understand and certify that I will be subject to the disciplinary authority of this State. A copy of this certification will be mailed contemporaneously to the State Bar of Montana in Helena. Furthermore, pursuant to Local Rule 83.2(a), I understand that the standards of professional conduct of attorneys appearing in this Court include the American Bar Association's Model Rules of Professional Conduct and the Montana Rules of Professional Conduct.

11. I swear and affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true to my knowledge.

Executed this 13 day of September, 2023 at Washington, DC.



Joel L. Thayer

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